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5					
6	Attorney for Plaintiff, RODNEY E. JACKSON				
7					
8	UNITED STATES DISTRICT COURT				
9	NORTHERN DISTRICT OF CALIFORNIA OAKLAND				
10	SAN FRANCISCO DIVISION				
11)	Case No. 13-cv-04484-KAW			
12	RODNEY E. JACKSON,)	STIPULATION AND PROPOSED ORDER FOR AN EXTENSION OF TIME FOR			
13	Plaintiff,)	PLAINTIFF TO FILE APPLICATION			
14)	FOR EQUAL ACESSS TO JUSTICE FEES (28 U.S.C. §2412)			
15	CAROLYN W. COLVIN, Acting Commissioner of the Social Security				
16	Administration,				
17	Defendant.				
18					
19	IT IS HEREBY STIPULATED, by and between the parties, through their respective				
20	counsel of record, that Plaintiff shall have a first extension of time of 35 days to file his				
21	Application for Equal Access to Justice Act fees ("EAJA", 28 U.S.C. §2412). The new due				
22					
23	date for filing Plaintiff's Application for EAJA fees will be July 9, 2015.				
24	This extension is necessary because Plaintiff's Attorney has a heavy caseload and				
25	would like additional time to discuss with Defendant's Attorneys and with the Plaintiff a				
26	possible agreement as to EAJA fees. Plaintiff's Attorney apologizes to the Court and to				
27					
28	STIPULATION TO EXTENSION OF TIME FOR PLAINTIFF TO FILE APPLICATION FOR EAJA FEES, AND PROPOSED ORDER; NO. 13-CV-04484-KAW				

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1	Defendant's Attorneys for the delay. The parties further stipulate that the Court's Scheduling		
2	Order shall be modified accordingly.		
3			
4	Respectfully submitted,		
5	Dated: <u>June 3, 2015</u>		/s/Donald H. Medearis
6			BAY AREA LEGAL AID Attorney for Plaintiff
7			Attorney for Frankfir
8			
9 10	Dated: <u>June 3, 2015</u>		MELINDA L. HAAG United States Attorney
11			ALEX G.TSE, Chief Civil Division, Region IX
12			Social Security Administration
13		By:	/s/Jeffrey Chen
14			(* as authorized by e-mail on June 3, 2015) Jeffrey Chen
15			Special Assistant United States Attorney Attorneys for Defendant
16	ORDER:		•
17			
18	APPROVED AND SO ORDERED		Y 11/1) IT 10
19	Dated:6/15/15		By:
20			United States Magistrate Judge
21			
22 23			
24			
25			
26			
27			
28	OTIDIU ATION TO EXTENSION O	\T- (T) I &	
	STIPULATION TO EXTENSION OF TIME FOR PLAINTIFF TO FILE APPLICATION FOR EAJA FEES, AND PROPOSED ORDER; NO. 13-CV-04484-KAW		